

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,  
Plaintiff

v.

EDGARDO TORRES AVILÉS  
Defendant.

CRIMINAL NO. 00-043 (PG)

MOTION INFORMING TRAVEL ABROAD

TO THE HONORABLE JUAN M. PÉREZ GIMÉNEZ  
UNITED STATES DISTRICT JUDGE  
FOR THE DISTRICT OF PUERTO RICO

**COMES NOW** DEFENDANT, Edgardo Torres Avilés, represented by the undersigned Court appointed counsel, and before this Honorable Court respectfully states and prays as follows:

1. The undersigned attorney informs that from Thursday, December 1st. to Monday, December 5, 2005 is taking his thirteen (13) year old son to a Tae Kwon Do tournament in the State of Florida. Furthermore, on December 6, 2005, the undersigned counsel has a judicial sale at Ponce Court in the case of *Abbott Laboratories de PR Inc. v. Island Medical & Hospital Supplies, Inc.*, Civil #JCD2002-0174 (604). The judicial sale was set during morning hours (11:15 a.m.) Also, on December 7, 2005 a status conference was set for 10:45 a.m. before judge Jay A. García Gregory in the case *U.S. v Kenneth Ocasio Martínez*. In the afternoon of December 7, 2005 the undersigned counsel has a medical appointment.

3. Hereby, it is requested from this Honorable Court, not to set a hearing for the business day of December 1, 2, 5, 6 and 7, 2005.

WHEREFORE, it is respectfully requested from this Honorable Court, to take knowledge of the aforementioned, and for any other relief it deems fair and just

RESPECTFULLY REQUESTED.

In Guaynabo, Puerto Rico, November 21, 2005.

S/ERNESTO REYES BLASSINO  
ERB LAW OFFICES a P.S.C.  
USDC-PR 207014  
PO Box 360-361  
San Juan, PR 00936-0361  
Tel. 787-782-8777 Fax 787-706-1533  
e-mail: [ernestor@erblawoffices.com](mailto:ernestor@erblawoffices.com)

### **CERTIFICATE OF SERVICE**

On November 21, 2005, I electronically filed the foregoing Motion for Discovery using the CM/ECF system which will send notification of such filing to the following: U.S. Attorney H.S García (Attn.: Assistant U.S. Attorney Sonia Torres); U.S. Probation Officer, Attn.: Damarys I. Tellado).

S/ERNESTO REYES BLASSINO  
ERB LAW OFFICES a P.S.C.  
USDC-PR 207014  
PO Box 360-361  
San Juan, PR 00936-0361  
Tel. 787-782-8777  
Fax 787-706-1533  
e-mail: [ernestor@erblawoffices.com](mailto:ernestor@erblawoffices.com)